



State of California
Respiratory Care Board
444 North 3rd Street, Suite 270
Sacramento, CA 95814
Telephone (916) 323-9983
Fax (916) 323-9999
www.rcb.ca.gov



August 14, 2003

Inquiry: I am a RRT/RCP with the following specialized education or credentials:

- (1) Completed a Medicare approved course in Hyperbaric Oxygen Therapy and am a member of the Underseas Hyperbaric & Medical Society.
- (2) Completed the requirement to become a Certified Wound Care Specialist through the American Academy of Wound Management.

Under the direct supervision of a California licensed, Board Certified Surgeon who has been specially trained in Hyperbaric Oxygen Therapy in accordance with Federal law, I perform the following duties:

- (1) Administer Hyperbaric Oxygen Therapy including ventilator care Cardiac and TcPO2 monitoring and management on the I.V. pump during Hyperbaric Oxygen procedure.
- (2) Routine wound assessment and dressing changes as ordered.
- (3) Minor sharp debridement.

In addition, I am required to pass an annual competency examination for all aspects of my duties. The American Academy of Wound Management requires Continuing Education Units in advanced wound care subjects to maintain the Certified Wound Specialist credentials.

Under the often cited document 3701, Article 1 of the General Provisions, am I in material breach of any provisions of Respiratory Care Board of California Standards of Practice Act?

Response: Based upon the qualification you expressed in your inquiry, I see no material breach of the Practice Act with reference to job duties 1 and 2. Section 3701 of the Practice Act recognizes the ability of therapists to have overlapping functions with physicians, nurses and other licensed health care providers. However, I will qualify my comments by saying that I did not officially see your education and credentials, as they were not provided to the Board.

With regards to duty 3 (Minor sharp debridement), the Board would guard this function as not prohibited but discouraged under the Practice Act. However, if this function is provided in a physician's office then the onus for competency and responsibility would fall to the physician's license that is regulated by the California Medical Board. For clarification from their perspective, I would recommend that you contact them for comment. Their contact information is provided below:

Medical Board of California
1426 Howe Avenue # 54
Sacramento, CA 95825
(800) 633-2322

Reference # 2003-C-20